

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re: Terrorist Attacks on September 11

**Case No.: 03-md-1570
(GBD)(SN)**

This document relates to:

Ashton et al. v. al Qaeda Islamic Army, et al., 02-cv-6977 (GBD)(SN) (and member case Marie Laure Anaya, et al. v. Islamic Republic of Iran, 1:18-cv-12341(GBD) (SN))

(ANAYA/IRAN IV)

Declaration of Familial Relationship

I, Vivian Lanham-Lowe, declare under penalty of perjury, as provided for by 28 U.S.C. §1746, that the following statements are true and correct:

1. My name is Vivian Lanham-Lowe, and I am the widow of Michael W. Lowe, who died on September 11, 2001, when the World Trade Center collapsed. I submit this Declaration for the purpose of demonstrating that my late husband, Michael, was the functional equivalent of a father to my biological children Donovan Lanham, Gary Lanham, and Jasmine Lanham.

2. The children's biological father was a Jamaican national named Gary Wade. Mr. Wade was incarcerated in approximately 1990, but upon release was then subsequently deported in 1995, after which time, he never returned to the United States. Mr. Wade's contact with Donovan, Gary, and Jasmine ceased almost completely at that time. Furthermore, he never provided any support whatsoever for me or his children when he was incarcerated, or after his deportation to Jamaica.

3. Michael and I first met and started dating in 1991. At the time Donovan was 3 years old, Gary was one year old, and Jasmine was a newborn. In mid-1991, Donovan, Gary, Jasmine, and I commenced living with Michael in Brooklyn. My three children lived with Michael and I as a family continuously until Michael's death on September 11, 2001. For a short time, Michael's daughter Karina also briefly lived with our family, but this ended in approximately 1998.

4. Michael and I were married on April 6, 1993.

5. Michael and I had a daughter together on May 9, 1995 when Charisma Lowe was born and joined our small family. Our four children were raised together, Charisma was simply the little sister of Donovan, Gary, and Jasmine, and there was never any notion that she was a "step-sister."

6. During the decade that we all lived together, Michael treated Donovan, Gary and Jasmine as his children. The three children referred to him as "dad," and while they were aware he was not their biological father, that had no bearing on their relationship. Michael treated them the same in every way as he treated his biological daughter Charisma.

7. While I worked occasionally, Michael, who was an electrician, was the main provider and the primary financial supporter in our family. Michael maintained our household and also filed income tax returns on which he listed all four of my children as his dependents.

8. In addition to his financial support, Michael treated Donovan, Gary, and Jasmine like his sons and daughter, emotionally and socially. Michael would give them advice and discipline like any loving father and, as to the outside world, there was no question that Donovan, Gary, Jasmine, and Charisma were all his children.

9. While Michael worked long hours, the weekends were exclusively reserved for family time. Specifically, Saturdays were reserved for family only, a fact that created a sort of ritual for our family. We would usually stay inside on the couch or in the bedroom and watch movies or cartoons together. I always made breakfast, and it was an intentional and thoughtful way to set aside scheduled time to make sure everyone was doing OK.

10. We lived as a family under the same roof until September 11, 2001, when Michael was taken from us. At that time, Donovan was fourteen, Gary was eleven, Jasmine ten, and Charisma was six.

11. In sum, Michael Lowe, my husband, was very much the father of Donovan, Gary, and Jasmine and they considered him to be their father in every way. Michael was the only father each of them had ever known.

12. Michael was in each child's life since the time they were small children, he supported them financially and emotionally as a father and a teacher, and each child misses him as a child who has lost their father.

13. The photos in Exhibit A are of Michael and his family.

8/24/2022
Execution: _____

Name (signature): *Vivian Lanham-Lowe*

Name (printed): Vivian Lanham-Lowe



Michael and Jasmine



Michael and Vivian

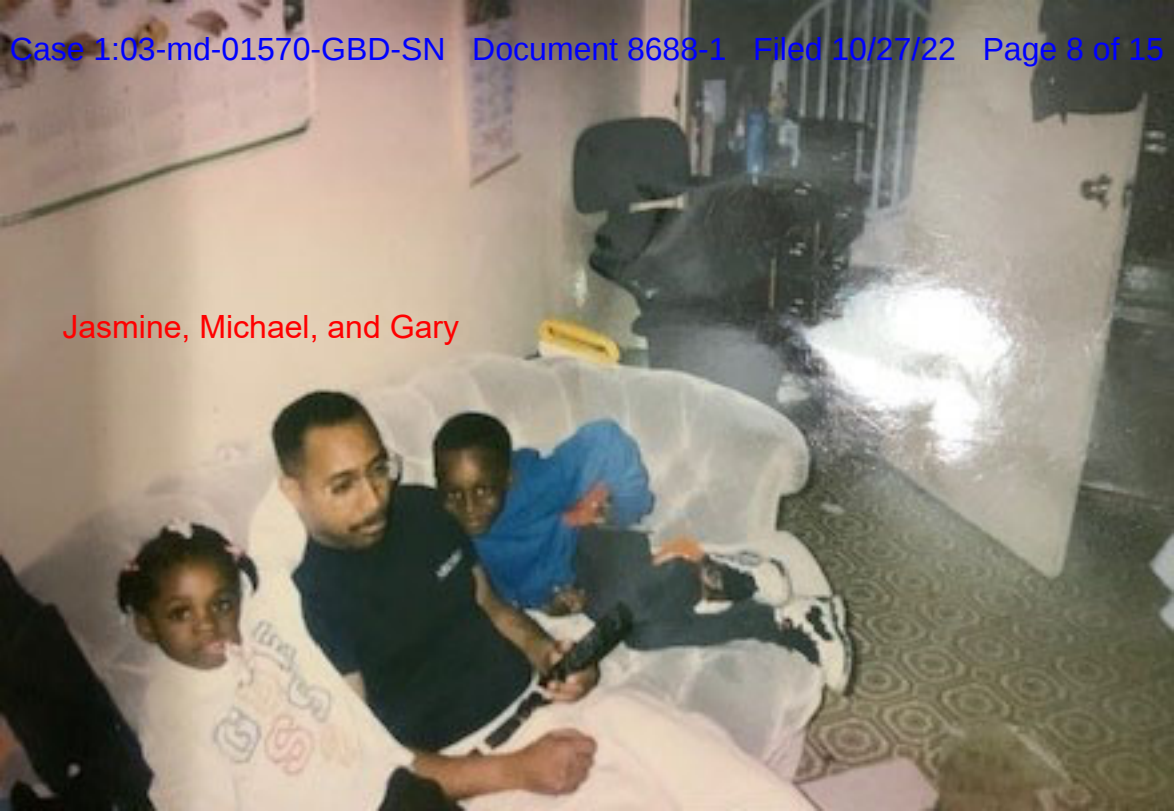


Charisma and Michael



Gary, Donovan, Michael, and Charisma at Charisma's Birthday

Jasmine, Michael, and Gary



Donovan, Charisma, and Michael





Gary

Donovan

Jasmine, Vivian, Michael, Charisma

Jasmine, Gary, Michael, Charisma





Michael and Vivian

Vivian's Brother

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Michael

Vivian's
Mother

Vivian's
Brother

Vivian

Donovan

Cousin

Jasmine

Gary

Great
Grandmother

Charisma





Michael

Donovan

Gary

Jasmine

Vivian

Charisma

Photo taken shortly before 9/11



Vivian and Michael